

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND**  
Baltimore Division

In re:	)	
Seth L. Blum and Bessy G. Blum	)	Case No. 25-10005
	)	
Debtors	)	Chapter 11 (Subchapter V)
<hr style="width: 50%; margin-left: 0;"/>		

**CONSENT MOTION FOR LEAVE TO FILE LATE PROOF OF CLAIM**

COMES NOW Presidential Bank, FSB (“Presidential Bank”), pursuant to Fed. R. Bankr. Proc. Rule 3003(c)(3) and Rule 9006(b)(1), and for its Consent Motion For Leave To File Late Proofs Of Claim, states as follows:

1. Presidential Bank is a secured creditor of the Debtors, holding two separate mortgages on beach homes owned by Debtors.
2. Debtors filed their petition in this matter on January 1, 2025.
3. The deadline to file non-governmental proofs of claim was March 12, 2025.
4. Presidential Bank is correctly identified in the mailing matrix attached to Debtors’ petition, however it never received the petition or any other notice of Debtors’ bankruptcy.
5. Presidential Bank first learned of the Debtors’ bankruptcy on March 12, 2025 when its employee spoke on the telephone with Mr. Blum.
6. Presidential Bank’s failure to file proofs of claim by the deadline is the result of excusable neglect as it had no notice of the bankruptcy filing or the deadline in sufficient time to meet the deadline.
7. On March 20, 2025 Presidential Bank filed two proofs of claim [Claim #32 and Claim #33] evidencing its two secured loans.
8. Debtors have not filed their Chapter 11 Plan, which is due July 7, 2025, there is no

prejudice to Debtors or any other stakeholder in this matter by the filing of Presidential Bank's proofs of claim after the March 12, 2025 deadline.

9. Presidential Bank has acted in good faith and has attempted to minimize any delay.

10. Debtors, through Counsel, and the Subchapter V Trustee consent to the instant motion.

11. Good cause exists for granting the instant motion.

12. Presidential Bank will not seek legal fees against the Debtors for the instant motion or otherwise resulting from the late filing of its proofs of claim.

**WHEREFORE**, Presidential Bank, FSB, by Counsel, with the consent of the Debtors, moves the Court for leave to file late proofs of claim, and for such other relief as the Court deems proper.

DATE: March 20, 2025

Presidential Bank, FSB

By: /s/ Jonathan E. Levine

Jonathan E. Levine, Esquire, Federal Bar No. 17490  
Mahdavi, Bacon, Halfhill & Young, PLLC  
11350 Random Hills Rd., Suite 700  
Fairfax, Virginia 22030  
Telephone: (703) 352-1300  
Facsimile: (703) 352-1301  
jlevine@mbhylaw.com  
*Counsel for Presidential Bank, FSB*

We consent to the relief requested above.

Seth L. Blum and Bessy G. Blum

By: /s/ Daniel Press (by JEL pursuant to authorization given on 3/19/2025)

Daniel Press, Esquire, Federal Bar No. 07300  
Chung & Press, P.C.  
6718 Whittier Ave. #200  
McLean, VA 22101  
Telephone: (703) 734-3800

Facsimile: (703) 734-0590  
dpress@chung-press.com  
*Counsel for Debtors*

Subchapter V Trustee, Monique D. Almy

By: /s/ Monique D. Almy (by JEL pursuant to authorization given on 3/19/2025)

Monique D. Almy  
Crowell & Moring  
1001 Pennsylvania Avenue, N.W., 10th Fl  
Washington, DC 20004-2595  
Telephone: (202) 508 8749  
Facsimile: (202) 628-5116  
malmy@crowell.com

**CERTIFICATE OF SERVICE**

I hereby certify that on this 20<sup>th</sup> day of March, 2025, that a true copy of the foregoing Motion was served via the Court's CM/ECF system or mailed, first-class, postage prepaid to Subchapter V Trustee, Monique Almy, Crowell & Moring, 1001 Pennsylvania Ave., NW, 10<sup>th</sup> Floor, Washington, DC 20004; and Daniel Press, Esquire, Counsel for Debtors, Chung & Press, P.C., 6718 Whittier Ave. #200, McLean, VA 22101.

/s/ Jonathan E. Levine  
Jonathan E. Levine